

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF PENNSYLVANIA

<p>In Re: Madeline A. Ceraul a/k/a Madeline Ann Ceraul Debtor(s)</p> <p>Toyota Motor Credit Corporation, Moving Party</p> <p>vs.</p> <p>Madeline A. Ceraul a/k/a Madeline Ann Ceraul Debtor(s)</p> <p>and Frederick L. Reigle, Esquire Trustee</p>	<p>Chapter 13</p> <p>Bankruptcy Number 16-17821 REF</p> <p>11 U.S.C. §362</p>
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**DEBTOR'S ANSWER TO MOTION TO OBTAIN RELIEF FROM THE
AUTOMATIC STAY**

Madeline A. Ceraul a/k/a Madeline Ann Ceraul, Debtor/Respondent, by and through her attorney, William Hronis, Esquire files this Answer to the Motion to Obtain Relief from the Automatic Stay of Toyota Motor Credit Corporation as follows:

1. Admitted.
2. Admitted.
3. Admitted.
4. Admitted.
5. Admitted.
6. Denied. Specific proof demanded at the time of hearing. By way of further answer, Movant, Toyota Motor Credit Corporation, has not attached and/or furnished a post-petition payment history in support of the averment.
7. (a), (b), (c). Denied. Specific proof is demanded at the time of hearing. By way of further answer, prior to the instant Motion, Movant, Toyota Motor Credit Corporation never requested production of proof of insurance on the 2013 Toyota Corolla.

8. Objection. The pleading calls for a response for which Debtor is unable to respond.
9. Denied. Debtor does not waive Bankruptcy Rule 4001(a)(3).
10. Objection. The pleading calls reimbursement of fees and costs under “terms of the mortgage.” The 2013 Toyota Corolla is a motor vehicle and is under a security agreement that is part of the Proof of Claim #2 filed with the Court and attached the instant Motion for Relief.

WHEREFORE, Debtor, MADELINE A. CERAUL A/K/A MADELINE ANN CERAUL, respectfully requests that this Court DENY the Motion for Relief from Automatic Stay of Toyota Motor Credit Corporation under 11 U.S.C. §362 and Bankruptcy Procedure 4001; and to grant any other relief that this Court deems equitable and just.

December 14, 2017

/s/William Hronis, Esquire

WILLIAM HRONIS, ESQUIRE (#59550)
609 HAMILTON STREET
ALLENTOWN, PA 18101
(610) 740-1004-Phone
(610) 740-9357-Fax